



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

VIA ECF

Hon. Vernon S. Broderick
United States District Judge
United States District Court
40 Foley Square
New York, New York 10007

APPLICATION GRANTED**SO ORDERED****VERNON S. BRODERICK****U.S.D.J.** 02/25/2025

Re: *Muslim American Society of Queens, et al., v. U.S. Citizenship and Immigration Services, et al., No. 23 Civ. 2867 (VSB)*

Dear Judge Broderick:

This Office represents the government in this action, in which plaintiffs seek judicial review of the denials by U.S. Citizenship and Immigration Services (“USCIS”) of two Forms I-129, Petitions for a Nonimmigrant Worker, that plaintiff Muslim American Society of Queens filed on behalf of plaintiff Akram Abdelsattar Hassanin Kassab. I write respectfully to request a one-week extension of the government’s deadline to file its reply in support of summary judgment and opposition to plaintiffs’ cross-motion for summary judgment and of its opposition to plaintiffs’ motion for additional discovery (i.e., from February 24, 2025, to March 3, 2025). After conferring with plaintiffs, I further request a corresponding extension of plaintiffs’ deadline to file their reply briefs. The new proposed briefing schedule would be:

- The government’s reply in support of its motion for summary judgment and opposition to plaintiffs’ cross-motion for summary judgment, and the government’s opposition to plaintiffs’ motion for additional discovery due by March 3, 2025; and
- Plaintiffs’ replies to the government’s oppositions due by March 24, 2025.

Pursuant to this Court’s order (ECF No. 23), on August 16, 2024, the government filed the certified administrative records of USCIS’s decisions on the Forms I-129 that plaintiffs are challenging in this case. ECF Nos. 24, 25. On November 15, 2024, the government filed its motion for summary judgment on all three of plaintiffs’ claims. ECF Nos. 32, 33. On January 6, 2025, plaintiffs filed an opposition to the government’s motion, a cross-motion for summary judgment on one claim, and a motion for additional discovery relating to the other two claims. ECF Nos. 34, 35, 36. Upon the government’s request, the Court previously extended the government’s deadline to respond to plaintiffs’ filings to today, February 24, 2025. ECF Nos. 37, 38. Unfortunately, however, undersigned counsel is ill and unable to finalize the government’s briefs today. Counsel respectfully seeks a short extension and apologizes for the timing of this request. This is the government’s second request for an extension of its deadline to file its reply in support of summary judgment and opposition to plaintiffs’ cross-motion for summary judgment and its opposition to plaintiffs’ motion for additional discovery. Plaintiffs consent to this request.

I thank the Court for its consideration of this request.